

**Federal Defenders  
OF NEW YORK, INC.**

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*Southern District of New York  
Jennifer L. Brown  
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March 30, 2023

**VIA ECF & EMAIL**

**Application granted. Dated: 3/31/23**

**SO ORDERED.**



**ANDREW E. KRAUSE**  
United States Magistrate Judge

The Honorable Andrew E. Krause  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street,  
White Plains, NY 10601

Re: *United States v. Errol Alveranga & Dona Taylor-Alveranga, 22-cr-3841-1, 2*

Dear Honorable Judge Krause:

I write to respectfully request that my client, Dona Taylor-Alveranga, and her husband and co-defendant, Errol Alveranga, release conditions be modified to permit them to travel as outlined below. Mr. Alveranga's counsel, James Neuman joins in this request.

Ms. Taylor-Alveranga and Mr. Alveranga made their initial appearance on May 11, 2022, before Your Honor and were released on conditions. They have been compliant with their conditions since their release. Ms. Taylor-Alveranga's 92-year-old mother is expected to have surgery on Monday, April 3, 2023, in Gainesville, Virginia. The couple was hoping to visit with her and care for her after the procedure. If approved, they would travel to Virginia on Saturday, April 1, 2023, and return on Wednesday, April 5, 2023.

I have contacted the Government, through Assistant United States Attorney Steven Kochevar, who has no objection to this request. Ms. Taylor-Alveranga and Mr. Alveranga's Pre-trial Officer, Shannon Finneran, also has no objection to this request. If this request is granted, Ms. Finneran requests that they share their travel plans with her, which they will do. Therefore, the Alverangas request permission to travel as outlined. Thank you for your time and consideration of this matter.

Respectfully submitted,



Elizabeth K. Quinn  
Assistant Federal Defender

cc: Steven Kochevar, AUSA  
Shannon Finneran, PTO  
James Neuman, Counsel for Errol Alveranga